

Sage Legal LLC

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December 19, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Taryn A. Merkl, U.S.M.J.
225 Cadman Plaza East
Courtroom 13D South
Brooklyn, NY 11201-1804

Re: Hernandez v. Happy Street LLC, et al.
Case No.: 1:22-cv-6918 (DG) (TAM)

Dear Judge Merkl:

This firm represents the Defendants in this case, who respectfully submit this letter motion to request a one (1) week extension of time for today's deadline to respond to Plaintiff's December 6, 2024 letter. See Text Only Orders dated December 9, 2024 and December 13, 2024.

Your undersigned is currently out of the country returning on December 24, 2024.¹ Based on the foregoing and because of the holidays, an extension of time until December 26, 2024 for Defendants to respond to Plaintiff's letter is warranted.

Accordingly, sufficient good cause exists for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
December 19, 2024

Respectfully submitted,
SAGE LEGAL LLC
By: /s/ Emanuel Kataev, Esq.
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Attorneys for Defendants
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Happy Street Too LLC, and
Slobodan Radivojevic a/k/a Bob Radivojevic

¹ Defendants previously failed to submit a response by December 12, 2024 due to an oversight in calendaring the deadline and your undersigned apologizes to the Court for this inadvertence.

VIA ECF

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